

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF IOWA**

KARLA O'NELL NORAMBUENA,)
NATALIA TAPIA LEIVA, ALMENDRA)
GONZALEZ DE LA PAZ, DAVID)
SILVA MORENO, FERNANDO)
VILCHES CASTILLO, CLAUDIO)
RAMOS, ALEJANDRO PIZARRO,)
EDUARDO ANTONIO MUÑOZ)
VARGAS, CARILYNS SARAI CAMUS)
JORQUERA, GONZALO ESCOBAR)
ESPEJO, CATALINA NOEMI RIVAS)
MORALES, BAIRON MOREL)
GUERRA, AND DIEGO CRISTOBAL)
AHUMADA SOULODRE,)

Plaintiffs,)

v.)

WESTERN IOWA TECH)
COMMUNITY COLLEGE (WITCC),)
TERRY YI, ROSANA SALGADO)
BURRIGHT, JULINE ALBERT, TERRY)
MURELL, JAMES ZUERCHER, LILY)
CASTRO, PREMIER SERVICES, INC.)
d/b/a J&L ENTERPRISES, also d/b/a)
J&L STAFFING AND RECRUITING)
INC., NANCY ALBRECHT, CARLOS)
ESPINOZA, SOLEDAD ROJAS, JORGE)
ACROS, CRISTIAN SAN MARTIN)
MATTA, TUR-PAK FOODS, INC., and)
ROYAL CANIN USA INC.)

Defendants.)

Case No. 5:20-cv-04054

**DEFENDANTS PREMIER SERVICES
INC.'S and NANCY ALBRECHT'S
PARTIAL MOTION TO DISMISS**

COME NOW Defendants Premier Services Inc., d/b/a J&L Enterprises also d/b/a J&L Staffing and Recruiting, Inc. ("J&L") and Nancy Albrecht ("Albrecht") (collectively "Defendants"), and pursuant to Fed. R. Civ. P. 12(b)(6), hereby move the Court to dismiss Counts

1-9 and 11 asserted against J&L and Albrecht in Plaintiffs' Third Amended Complaint and Jury Demand ("TAC").

For the reasons set forth in Defendants' accompanying Brief in Support of Partial Motion to Dismiss, Defendants respectfully request the Court enter an order dismissing Counts 1-9 and 11 asserted against J&L and Albrecht in Plaintiffs' TAC with prejudice and without leave to amend, and for such other relief as the Court deems appropriate.

Dated this 29th day of June 2021.

Respectfully submitted,

PREMIER SERVICES, INC., and NANCY
ALBRECHT,
Defendants

/s/ Sarah J. Millsap

Sarah J. Millsap, #AT0007538
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2021, I electronically filed the foregoing with the Clerk of the Court using the court's electronic filing system which sent notification of such filing to all parties of record.

/s/ Sarah J. Millsap